

REMARKS

Claims 1-12 are all the claims pending in the present application. The Examiner maintains the same rejections as set forth in the previous Office Action, and adds a few new arguments in the *Response to Arguments* section of the present Office Action. Specifically, claims 1-3 remain rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Takihara (U.S. Patent No. 6,941,387). Claims 4-12 remain rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Takihara in view of Iizuka et al (U.S. Patent No. 5,974,015).

§ 102(e) Rejections (Takahara) - Claims 1-3

Applicant traverses the rejections of claims 1-3 at least based on the following reasons.

With respect to independent claim 1, Applicant previously argued, in part, that the Examiner appears to pick and choose the different modules described in Takihara, and the elements thereof, as allegedly satisfying the claimed hard disk drive module and the elements set forth in claim 1. That is, Applicant argued that the Examiner has not shown at least in Takihara a claimed memory, a claimed interface portion, a claimed recording and reproducing portion, and a control portion, which all constitute a hard disk module. In response, the Examiner alleges:

The Applicants argue on page 3, lines 19-22 that Takihara fails to disclose the claimed memory, a claimed interface portion, a claimed recording and reproducing portion, and a control portion, which all constitute a hard disk module. The Examiner respectfully disagrees. Takihara discloses in Fig. 2 a hard disk module comprising: a memory (122 and 123), an interface portion (125, which is connected to 357 of the motherboard), a recording and reproducing portion (124 — col. 10, lines 4-18), and a control portion (121). Therefore, Takihara meets the claimed limitations and the rejection is maintained.

In response, Applicant submits that the Examiner still has not demonstrated that Takihara satisfies each and every limitation of the claimed invention. As indicated above, the Examiner alleges that the 1394 cable of Fig. 2 corresponds to a hard disk module. Nowhere does Fig. 2

show that the 1394 cable comprises a memory, an interface portion, a recording and reproducing portion, and a control portion. Yet further, the elements that correspond to the particular cited reference numbers do not constitute the 1394 cable of Fig. 2 in Takihara. For example, the interface portion, which allegedly corresponds to element 125 in Takihara, does not constitute the 1394 cable of Fig. 2. Therefore, the Examiner's argument is not tenable.

Further, Applicant previously argued that Takihara does not disclose or suggest at least, "wherein the main board is mounted on the modular television," as recited in claim 1. The Examiner believes that the PC module of Fig. 3 corresponds to the claimed hard disk module. However, nowhere does Takihara disclose or suggest that the PC module has a main board that is mounted on a modular television. The 1394 interface module 357 is only used to connect to other AV devices (e.g., an MPEG1 module; *see col. 8, line 64 - col. 9, line 6*), but nowhere is it disclosed or suggested that a main board is mounted on a modular television. In response, the Examiner alleges:

The Applicant argues on page 4, lines 2-5 that Takihara does not disclose or suggest at least, that the PC module has a main board that is mounted on a modular television. The Examiner respectfully disagrees. The Examiner believes that the PC module of Fig. 3 corresponds to the main board represented as reference character "1" in Fig. 1 and that the hard disk module is reference character "2" in Fig. 1. Fig. 3 is a blown-up interpretation of the PC module (1) depicted in Fig. 1, which is what the Examiner is considering the main board. Furthermore, Takihara discloses in col. 8, lines 64-67 that a 1394 interface (I/F) of the mother board is connected to the MPEG1 Video deck module "2" (hard disk module "2"), which is the same setup disclosed by the Applicant. Therefore, with those interpretations Takihara meets the claim limitations.

In response, Applicant submits that the Examiner still has not identified where a main board is mounted on a modular television. Applicant respectfully requests that the Examiner

identify the particular component of Takiyara which she believes corresponds to the modular television and then identify where a main board is mounted on said component.

Yet further, Applicant previously argued that the "MPEG1 Video Deck module" of Takiyara does not disclose or suggest any element corresponding to "a memory having a program stored therein for controlling the entire components connected to a bus disposed inside the hard disk module" as recited in claim 1. In response, the Examiner alleges:

The Applicant argues on page 4, lines 8-11 that the "MPEG1 Video Deck Module" of Takiyara does not disclose or suggest any element corresponding to "a memory having a program stored therein for controlling the entire components connected to a bus disposed inside the hard disk module" as recited in claim 1. The Examiner respectfully disagrees. Takiyara discloses a memory (122 and 123) having a program stored therein for controlling the entire components connected a bus disposed inside the hard disk module, which are described in col. 10, lines 5-8 - a CPU (121) that executes various processes in accordance with a program stored in a ROM (122). Data necessary for the CPU (121) to execute various processes are stored suitably into a RAM (123). Therefore, Takiyara meets the claimed limitations and the rejection is maintained.

In response, Applicant submits that even if, *arguendo*, a CPU executes various processes, there is no specific teaching or suggestion of a memory having a program stored therein for controlling the entire components connected to a bus disposed inside the hard disk module. Nowhere are these specific features taught or suggested by Takiyara.

Applicant submits that dependent claims 2 and 3 are patentable at least by virtue of their respective dependencies from independent claim 1.

§103(a) Rejections (Takiyara / Iizuka) - Claims 4-12

With respect to independent claims 4 and 10, Applicant submits that these claims are patentable at least based on reasons similar to those set forth above with respect to claim 1. Iizuka does not make up for the deficiencies of Takiyara.

Applicant submits that dependent claims 5 and 11 are patentable at least by virtue of their respective dependencies from independent claims 4 and 10.

Further, with respect to claim 5, the Examiner takes Official Notice that a hard disk is initialized by a control portion when the control portion receives the IRQ signal. In response, Applicant submits that that the Examiner has made extremely liberal use of the concept of Official Notice. As the Examiner is no doubt aware, it is impermissible to rely upon official notice at a point of novelty in the claimed invention. Accordingly, Applicant maintains the previously submitted arguments that the applied references, either alone or in combinations, do not satisfy the features of claim 5.

Yet even further, Applicant submits that FIG. 2 of Takiyara does not show elements corresponding to the elements of claim 1 of the present invention. That is, the hard disk module of claim 1 of the present invention can be, for example, connected to a main board installed in the modular television, whereas the MPEG 1 video deck module of Takiyara is connected to a motherboard installed in the PC module. Furthermore, the hard disk module of claim 1 of the present invention is for a modular television, but it is not disclosed that the MPEG 1 video deck module of Takiyara is for a modular television. Moreover, the memory of claim 1 of the present invention can, for example, store a program for controlling all the components connected to a bus disposed inside the hard disk module, whereas Takiyara just discusses that a ROM stores a program for processing various operations, but does not recite that the ROM stores a program for controlling all components.

At least based on the arguments set forth above, Applicant submits that 1-12 are patentably distinguishable over the applied references.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

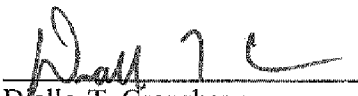
Respectfully submitted,

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER


Diallo T. Crenshaw
Registration No. 52,778

Date: August 3, 2007